Case:17-00982-swd Doc #: Filed: 07/02/2021 Page 1 of 2

IN THE UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF MICHIGAN

IN RE:

CASE NO. 19-00593

Deidre Rose Uhl § Chapter 13

Shaun Orlo Kristopher Uhl § Hon. John T Gregg

Filed 02/18/2019

Debtor(s) §

DEBTORS' RESPONSE TO TRUSTEE'S MOTION TO DISMISS CHAPTER 13 PROCEEDINGS

NOW COME Debtor(s), Deidre Rose Uhl & Shaun Orlo Kristopher Uhl, by their counsel, Mapes Law Offices, and for their response to the Trustee's Motion to Dismiss Chapter 13 Proceedings, states as follows:

- 1. That this Chapter 13 case was filed on 02/18/2019.
- 2. That the Chapter 13 Plan was confirmed on 07/17/2019.
- 3. That the Debtors have already submitted their 2020 tax returns to the Trustee.
- 4. That the Debtors received no net refunds for tax year 2020.

WHEREFORE, the Debtors request that this Honorable Court deny the Trustee's Motion to Dismiss Chapter 13 Proceedings and grant the Debtors such other and further relief as is just in the premises.

Dated: <u>07/02/2021</u> /s/Jeffrey D. Mapes

Jeffrey D. Mapes, Attorney for Debtor

29 Pearl St. NW, Ste. 305 Grand Rapids, MI 49503 Phone: (616) 719-3847

Fax: (616) 719-3857

Case:17-00982-swd Doc #: Filed: 07/02/2021 Page 2 of 2

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on 07/02/2021 a true and correct copy of the foregoing was served on all parties in interest below.

Dated: <u>07/02/2021</u> /s/Jeffrey D. Mapes

Jeffrey D. Mapes, Attorney for Debtor

29 Pearl St. NW, Ste. 305 Grand Rapids, MI 49503 Phone: (616) 719-3847

Fax: (616) 719-3857

DEBTORS:

Deidre & Shaun Uhl 265 Beymoure St. Kalamazoo, MI 49009

CHAPTER 13 TRUSTEE

Brett N Rodgers ecf@rodgersch13.com, backup1@rodgersch13.com

U.S. TRUSTEE

United States Trustee 125 Ottawa NW Ste 202R Grand Rapids, MI 49503